

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS
D.T.E. 03-60**

Pursuant to 220 C.M.R. § 1.06 (6) (c), the Department of Telecommunications and Energy ("Department") submits to all providers of local exchange service ("LECs") in Massachusetts the following Information Requests.

I. Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to LECs and ILECs in this proceeding.

- 1) Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
- 2) Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
- 3) These requests shall be deemed continuing so as to require further supplemental responses if your or your witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
- 4) The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
- 5) The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
- 6) If you or your company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

- 7) If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.
- 8) Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit two (2) copies of the responses to Paula Foley, Hearing Officer, and one copy each to Michael Isenberg and April Mulqueen of the Telecommunications Division. Subject to the terms of the Protective Order issued in this proceeding, please also serve one copy of the responses upon each party whose name and address appears on the service list for this proceeding.
- 9) If your response to an information request includes proprietary information, please follow the instructions for treatment of proprietary information in the Protective Order issued in this proceeding.

II. Definitions

Unless otherwise indicated, the terms used in these information requests shall have the meanings as defined in the FCC's Triennial Review Order.

"ILEC" means incumbent local exchange company, including Verizon-Massachusetts and all independent incumbent local exchange companies.

"CLEC" means competitive local exchange company.

"Intermodal" refers to facilities or technologies other than those found in traditional telephone networks, but that are utilized to provide competing services. Intermodal facilities or technologies include, but are not limited to, traditional or new cable plant, wireless technologies, and power line technologies.

Local circuit switching means all line-side and trunk-side facilities, plus the features, functions, and capabilities of the switch. The features, functions and capabilities of the switch shall include the basic switching function of connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks. Local circuit switching includes all vertical features that the switch is capable of providing, including custom calling, custom local area signaling services features, and Centrex, as well as any technically feasible customized routing functions.

"Rolling" access means the use of unbundled local circuit switching for a limited period of time for each end-user customer to whom a requesting telecommunications carrier seeks to provide service.

"Triennial Review Order" means the FCC's Report and Order and Order on Remand and Further Notice of Proposed Rulemaking in CC Docket Nos. 98-147, 96-98, and 98-147, FCC 03-36 (rel. August 21, 2003), as amended.

III. Information Requests**TO COMPETITIVE LOCAL EXCHANGE SERVICE PROVIDERS OPERATING IN MASSACHUSETTS:**

D.T.E.-CLEC 1. The following questions pertain to enterprise loops (DS1, DS3, Dark Fiber):

- a. please list all customer locations in Massachusetts where you provide DS1 and DS3 capacity facilities;
- b. please list all customer locations where you provide Dark Fiber (only include those facilities you own or obtain through an indefeasible right to use),
- c. for each facility, indicate what capacity service you are providing (DS1 or DS3) over the facility; and
- d. for each facility and each capacity, indicate whether you are providing it to yourself (self-provisioning) or provide it on a wholesale basis to another unaffiliated service provider.

D.T.E.-CLEC 2. The following questions pertain to dedicated transport:

- a. please list all routes in Massachusetts where you provide DS1 and DS3 capacity facilities;
- b. please list all routes where you provide Dark Fiber; and indicate whether you own or lease each Dark Fiber facility (only include those facilities you own or obtain through an indefeasible right to use);
- c. for each facility, indicate what capacity service you are providing (DS1 or DS3) over the facility; and
- d. for each facility and each capacity, indicate whether you are providing it to yourself (self-provisioning) or provide it on a wholesale basis from another unaffiliated service provider.

D.T.E.-CLEC 3. The following questions pertain to mass market switching:

- a. list the switches that you use in Massachusetts to provide local exchange voice service to mass market customers, the switch location(s), and the area(s) served by these switches;
- b. for each switch identified in Question 3(a) above, indicate whether you provide the switch for your own use (self provisioning) or lease wholesale capacity on the switch from another unaffiliated provider;
- c. provide any other evidence of actual deployment, including any intermodal providers of comparable service using self-provisioned switches to serve end users using DSO capacity loops;

- d. list any actual or potential market barriers, including, but not limited to, loop provisioning, difficulties in obtaining collocation space due to lack of space or delays in provisioning by the ILEC, difficulties in obtaining cross-connects in the ILEC's wire center;
- e. list any economic barriers, including costs of migrating ILEC loops to requesting telecommunications carrier's switches, the costs of backhauling voice circuits to requesting telecommunications carriers' switched from the end offices serving their end users;
- f. provide the maximum number of DSO loops for each geographic market that you, as a requesting telecommunications carrier, can serve through unbundled switching when serving multiline end users at a single location; and
- g. indicate whether any impairment would be cured by transitional ("rolling") access to local circuit switching on an unbundled basis for a period of 90 days or more.

D.T.E.-CLEC 4. Please provide the number of mass market customers to whom you actually provide competitive local exchange service in Massachusetts, the geographic area(s) where you provide such service, and whether you resell such service or provide it using your own facilities. If you partially use your own facilities to provide such service, please list the self-provisioned facilities used to provide the service by customer and location.